

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OHIO
EASTERN DIVISION**

Sarah Aronson, M.D.)	CASE NO. 1:10-CV-00372
)	
Plaintiff,)	JUDGE CHRISTOPHER A. BOYKO
)	
vs.)	<u>PLAINTIFF'S PROPOSED</u>
)	<u>VOIR DIRE QUESTIONS</u>
University Hospitals of Cleveland,)	
)	
)	
)	
Defendants)	

PROPOSED VOIR DIRE QUESTIONS

1. You will hear evidence that the Plaintiff is a gay woman who lives with a domestic partner and that they have children together. How do you feel about that?
2. Plaintiff is claiming that she had the right to take time off for the birth and adoption of her partner's son. Does her sexual orientation have any impact on how you may feel about her right to take family leave time from work?
3. Do you have any family or friends who are employed by University Hospitals of Cleveland?
4. Have you had any medical training? If so, please tell me about that training.
5. Plaintiff was employed as a resident physician. She was being trained to be an anesthesiologist. Does the fact that her employment was also a part of her education effect how you feel about any employment rights she may have had?
6. Does the fact that Plaintiff's employment was also a part of her education effect how you feel about any employment obligations that the Defendant may have had?

7. What do you know about the training that a doctor has to go through *after* completing medical school?
8. Defendant is going to argue that Plaintiff had to have her training extended because she did not satisfactorily complete her last scheduled level of training. Plaintiff is going to argue that the Defendant kept her in training longer than she deserved to be. Training doctors is an obviously important function that we all depend upon. You may have to decide who is right. Plaintiff is a doctor. Most of the witnesses who will testify on behalf of the Defendant will be doctors. How do you feel about judging the decision making of doctors?
9. Plaintiff is claiming that she had a contract with the Defendant and the Defendant breached the contract. Defendant claims it did everything it had to do under the contract. The contract was for Defendant to employ Plaintiff and train her to become an anesthesiologist. Do you have any concerns about being able to decide whether the doctors who supervised the Plaintiff followed the contract?
10. Under what circumstances should an employee be allowed to sue their employer?
11. What obligations do you think an employer owes an employee?
12. What obligations do you think an employee owes an employer?
13. Have you been divorced before? Who sued who for divorce? What did you think of the process?
14. What do you think a juror's duties should be?
15. Please describe any previous jury service. Have you ever been a jury foreperson?
16. Have you ever been accused of retaliation?
17. Do you belong to any clubs, social organizations, or political groups? If so, what are they?
18. Do you do any volunteer work? What kind? How much? How long? Why did you start it?

19. Have you ever been involved in making a decision to terminate someone's employment? What happened? How do you think that experience might affect you here?
20. What do you think about the job government is doing to regulate the workplace?
21. Have you owned a business before? What kind? How many employees? What was your role?
22. Have you ever received any training or education about employment laws or other company liability issues?

Respectfully Submitted,

/s/ Gregory A. Gordillo
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CERTIFICATE OF SERVICE

A copy of the foregoing Plaintiff's Proposed Voir Dire Questions was electronically filed and served on all parties this May 9, 2011.

/s/ Gregory A. Gordillo
One of the attorneys for the Plaintiff